

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	
COUNTY OF GREENVILLE)	C.A. No.:
)	
Deanna Parris and Brian Parris)	
)	SUMMONS
Plaintiff(s),)	
v.)	
)	
Walmart, Inc. and Walmart Stores)	
East, L.P.,)	
)	
Defendant(s).)	
_____)	

TO THE DEFENDANT(S) ABOVE-NAMED:

YOU ARE HEREBY SUMMONED and required to answer the Complaint herein, a copy of which is herewith served upon you, and to serve a copy of your Answer to the said Plaintiff upon the subscriber, at his office at 1007 East Washington Street, Greenville, South Carolina, within thirty (30) days after the service hereof, exclusive of the day of such service, and if you fail to answer the Complaint within the time aforesaid, judgment by default will be rendered against you for the relief demanded in the Complaint.

CHRISTIAN & CHRISTIAN
Attorneys at Law
Post Office Box 332
Greenville, South Carolina 29602
(864) 232-7363

s/Joshua D. Christian
Joshua D. Christian
S.C. Bar No.: 73820
Attorneys for Plaintiffs

Greenville, South Carolina
Date: November 17, 2022

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
COUNTY OF GREENVILLE)	C.A. No.:
Deanna Parris and Brian Parris,)	
Plaintiff(s),)	COMPLAINT
v.)	
Walmart, Inc. and Walmart Stores)	
East, L.P.,)	
Defendant(s).)	
_____)	

That the Plaintiff(s), above named, complaining of the Defendant(s) herein would respectfully show unto this Court as follows:

1. Plaintiffs Deanna Parris and Brian Parris (hereinafter "Plaintiffs"), are citizen and residents of Greenville County, South Carolina.
2. That all times relevant herein, Deanna Parris and Brian Parris are and were husband and wife.
3. Walmart, Inc., is a business organized and existing under the laws of South Carolina, lying and situated in Greenville County, South Carolina. All references to this Defendant in include the acts and omissions, its agents, servants, and duly elected officials.
4. Walmart Stores East, L.P. is a business organized and existing under the laws of the State of Arkansas of the United States and maintains agents, servants, and property in the County of Greenville, State of South Carolina, for the purpose of doing

business therein, Further, Walmart Stores East, L.P. transacts a substantial business and has substantial contacts in the State of South Carolina, County of Greenville.

5. At all times relevant, Walmart, Inc. maintained and serviced location 3950 Grandview Drive, Simpsonville, South Carolina, where Plaintiff fell.

6. At approximately, on or about July 28, 2021, Plaintiff tripped and fell over a rug which was improperly placed, improperly used and not properly secured to the floor.

7. Unbeknownst to Plaintiff, the rug was bunched up causing a hazardous area, such hazard was unreasonable, dangerous, and not visible to Walmart patrons.

8. Upon encountering the hazard, Plaintiff fell and suffered serious injuries and damages as set forth below:

- a. She suffered injuries, bruises, contusions, and lacerations about various parts of the body;
- b. She suffered extreme, painful and dangerous injuries to her leg;
- c. She has incurred, and will incur in the future, substantial medical and doctor bills;
- d. She has and will continue in future to be subjected to extreme pain, mental anguish, suffering, discomfort, and impairment and disability;
- e. She was humiliated and embarrassed before her friends and neighbors;
- g. She has been prevented from attending to her usual and ordinary household duties, and;

h. in such other and further ways as discovery and trial shall prove.

9. That Plaintiff is informed and believes that Defendant has knowledge of and knows that the rugs they use do not stay properly in place.

10. The Defendant was aware or should have been aware of this unreasonably dangerous condition.

11. The Defendant, by and through their acts and/or omissions were negligent, careless, reckless, willful, and wanton in the following particulars:

- a. in failing to properly maintain the entrance of the facility;
- b. in failing to warn pedestrians and Plaintiff of the hazard in the bunched-up rug at the entrance;
- c. in failing to take proper cautionary steps to keep pedestrians like Plaintiff from encountering such hazard;
- d. in failing to provide a safe alternative to the hazardous and dangerous entrance;
- e. in failing to properly observe and maintain the entrance to prevent such hazards;
- f. in failing to properly correct safety hazards with their rugs for which they are aware;
- g. in using floor mats that Defendant knows violates established codes and standards; and
- h. in such other and further ways as discovery and trial shall prove.

12. As a direct and proximate result of Deanna Parris' injuries and the Defendant's acts and/or omissions as stated herein, Plaintiff Brian Parris has and will in

the future continue to suffer for the loss of Deanna Parris' aid, comfort, society, services, love, affection, and consortium.

WHEREFORE, the Plaintiff prays for judgment against the Defendants for actual damages in an amount sufficient to compensate her for her injuries and losses, for punitive damages in a reasonable sum, for the costs and disbursements of this action, and for such other and further relief as this Court may deem just and proper.

Plaintiff requests a jury trial.

Respectfully Submitted,

CHRISTIAN & CHRISTIAN

s/Joshua D. Christian
Joshua D. Christian
S.C. Bar No.: 73820
Attorney at Law
1007 East Washington Street
Post Office Box 332
Greenville, South Carolina 29602
(864) 232-7363

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